

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

MARY CONWAY,	:	
	:	
Plaintiff,	:	Case No.
	:	
	:	
v.	:	
	:	
BLATT, HASENMILLER, LEIBSKER	:	
& MOORE, LLC,	:	
	:	
Defendant	:	

NOTICE OF REMOVAL

**To: Clerk – United States District Court for the
Middle District of Pennsylvania**

PLEASE TAKE NOTICE THAT on this date, Defendant Blatt, Hasenmiller, Leibsker & Moore, LLC, hereby removes the above-captioned matter to this Court from the Court of Common Pleas of Lackawanna County, and in support thereof avers as follows:

1. Defendant Blatt, Hasenmiller, Leibsker, & Moore, LLC is a defendant in a civil action originally filed on or about March 31, 2017, in the Court of Common Pleas of Lackawanna County, titled *Mary Conway v. Blatt, Hasenmiller, Leibsker & Moore, LLC*, and docketed to Case No. 2017-2112.
2. This removal is timely under 28 U.S.C. § 1446(b). Defendant first received a copy of Plaintiff's Complaint by service on or about May 30, 2017.
3. Pursuant to 28 U.S.C. § 1446, attached hereto as Exhibit A are copies of all process, pleadings and orders received by Defendant in the state court action.

4. The United States District Court for the Middle District of Pennsylvania has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, in that Plaintiff has filed claims against Defendant alleging violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*

5. On this date, Defendant has provided notice of this removal to all parties and to the Court of Common Pleas of Lackawanna County, Pennsylvania

WHEREFORE, Defendant removes this case to the United States District Court for the Middle District of Pennsylvania.

Respectfully submitted,

BARRON & NEWBURGER, P.C.

By: 

BRIT J. SUTTELL, ESQUIRE
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Counsel Defendant Blatt, Hasenmiller, Leibsker
& Moore, LLC

Dated: June 19, 2017

CERTIFICATE OF SERVICE

I certify that on June 19, 2017, a true copy of the foregoing document was served on Plaintiff's Counsel below via electronic means:

Carlo Sabatini, Esq.
Sabatini Law Firm, LLC
216 N. Blakely St.
Dunmore, PA 18512
Counsel for Plaintiff

I further certify that on June 19, 2017, a true copy of the foregoing document was served on the persons below via U.S. Mail, postage pre-paid:

Prothonotary – Civil Division
Lackawanna County
Court of Common Pleas
Brooks Building
436 Spruce Street
Scranton, PA 18503

BARRON & NEWBURGER, P.C.

By: /s/ Brit J. Suttell
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(484) 999-4232
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Counsel for Defendant Blatt, Hasenmiller,
Leibsker & Moore, LLC

Dated: June 19, 2017